

January 9, 2012

Mr. Manucher Alemi
Chief, Water Use and Efficiency Branch
Department of Water Resources
901 P Street
Sacramento, California 95814

RE: Comments on the December 21, 2011 Draft Report to the Legislature *A Methodology for Quantifying the Efficiency of Agricultural Water Use*

Dear Manucher:

We appreciate this additional opportunity to provide comments on the draft report to the Legislature, *A Methodology for Quantifying the Efficiency of Agricultural Water Use* (Draft Report). Considerable progress has been made on the document since the last draft. But, there remain sections within the report containing text that is not accurate or we believe would prove confusing to the Legislature. As was the case with our earlier comments, the attached “strike-and-insert” comments and recommended changes to the Draft Report are crafted with the goal of providing the Legislature with a document that contains the information it needs to make informed decisions regarding future legislation, and fully understand the impact that legislation will have on the State budget, individual landowners, local government entities and third parties.

The next draft of the document needs to include more thorough cost estimate figures. We are concerned that the incomplete estimates in the current draft are substantially underestimating the implementation costs. But, more comprehensive figures are needed to make this determination.

In addition, as we mentioned in our previous comments, “productivity indicators” cannot be used to quantify the efficiency of agricultural water use and therefore are not part of the methodology. According to Water Code Sec. 10608.64, “The plan [included in the report to the Legislature] shall include the estimated implementation costs and types of data needed to support the methodology [emphasis added].” Because the “productivity indicators” are not included in the methodology, according to the Water Code they should not be included in the implementation plan, nor should a cost estimate for their implementation be developed.

Thank you for considering our proposed changes to the Draft Report. We would welcome the opportunity to discuss our proposed changes in greater detail. Once again, we hope that these recommendations will assist DWR in crafting a final Report that complies with the legislative mandate, and moreover provides value and guidance to the Legislature.

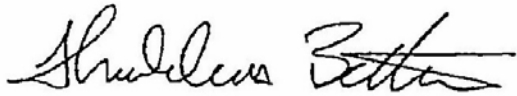
Sincerely,



Todd Manley
Northern California Water Association



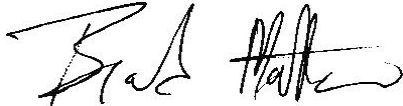
Ted Trimble
Western Canal Water District



Thad Bettner
Glenn-Colusa Irrigation District



Tim O'Halloran
Yolo County Flood Control &
Water Conservation District



Brad Mattson
Richvale Irrigation District